

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

FILED
CLERKS OFFICE
MAR 24 P 12:41
U.S. DISTRICT COURT
DISTRICT OF MASS.
CASE NO.

Joseph Gentle Moose Blake,
Plaintiff,

v.

Robert Murphy,
Kathleen Dennehy,
Massachusetts Department of Corrections,
Defendants.

MOTION FOR THE APPOINTMENT OF COUNSEL

The plaintiff, Joseph Gentle Moose Blake, pursuant to Title 28 U.S.C. §1915, request this court appoint counsel to represent him in this case for the following reasons:

1. The plaintiff is unable to afford counsel;
2. The issues in this case are complex;
3. The plaintiff has extremely limited access to the law library;
4. The plaintiff has extremely limited knowledge of the law; and
5. The defendants have demanded a trial by jury.

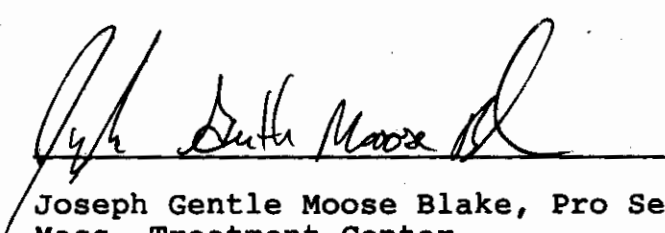
Alternatively if the court cannot appoint counsel for the plaintiff, the plaintiff moves that the court order the defendants to allow the plaintiff to purchase a power MAC G5 computer and an Epson Stylus CX4600 printer or a computer and printer of up to similar quality and value, as well as a variety of supporting software so that if the plaintiff is going to represent himself he can atleast prepare pleading as efficiently and in as proffessional appearance as counsel for the defendants.

Please note that other inmates at the Treatment Center have personal computers and printers so there is no "legitimate penological" reason why the plaintiff should not have one. This is consistant with least restrictive conditions of confinement required by

(2)

Youngberg v. Romeo, Seling v. Young, and the Americans with
Disabilities Act.

DATED: 3/22/06



Joseph Gentle Moose Blake, Pro Se
Mass. Treatment Center
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